1	JONATHAN D. BLUM, ESQ. Nevada Bar No. 09515		
2	WILEY PETERSEN		
3	1050 Indigo Dr., Suite 200B Las Vegas, Nevada 89145		
4	Telephone No. (702) 910-3329 Facsimile: (702) 553-3467		
5	jblum@wileypetersenlaw.com		
6	Samuel L. Butt (admitted pro hac vice) sbutt@schlamstone.com		
7	Joshua D. Wurtzel (admitted pro hac vice)		
	jwurtzel@schlamstone.com SCHLAM STONE & DOLAN LLP		
8	26 Broadway New York, NY 10004		
9	Telephone: 212-344-5400 Facsimile: 212-344-7677		
10			
11	Attorneys for Plaintiffs John Suprock, Laurie Suprock, Consortium LLC, and Renewable Energy		
12	Now, LLC	ICEDICE COURT	
13	UNITED STATES DISTRICT COURT		
14	DISTRICT OF NEVADA		
	JOHN L. SUPROCK, an individual, LAURIE L.	Case No. 2:21-cv-02184-JAD-BNW	
15	SUPROCK, an individual, CONSORTIUM LLC, a South Dakota limited liability company, and		
16	RENEWABLE ENERGY NOW, LLC, a	STIPULATION AND PROPOSED ORDER TO EXTEND BRIEFING	
17	Montana limited liability company,	DEADLINES	
18	Plaintiffs,	(FIRST REQUEST)	
19	V.		
20	OLIANTIM ENERGY ING. N. 1	[ECF No. 73]	
21	QUANTUM ENERGY, INC., a Nevada corporation, and CLEARTRUST, LLC, a Florida		
	limited liability company,		
22	Defendants.		
23			
24			
25	Plaintiffs John L. Suprock ("Mr. Suprock"),	Laurie L. Suprock ("Mrs. Suprock"), Consortium	
26	LLC ("Consortium"), and Renewable Energy Now,	LLC ("Renewable Energy" and, collectively, with	
27	Mr. Suprock, Mrs. Suprock, and Consortium, "Pl	aintiffs") and Defendant Quantum Energy, Inc	
28	("Defendant" and, collectively with Plaintiffs, the "	Parties"), by and through their counsel of record	

jointly move the Court to extend the deadlines for oppositions and replies to the Parties' respective motions for summary judgment filed on July 7, 2023 (ECF Nos. 71 and 72, the "Motions").

- 1. Pursuant to LR IA 6-1, this is the Parties' first joint request to extend deadlines with respect to the Motions. The extension is requested because one of Plaintiffs' counsel has long planned travel plans out of the country during the time oppositions would be due, and because counsel for both Parties have other professional obligations necessitating the extension.
- 2. The continuance requested herein is not sought for the purposes of delay and will not result in prejudice to the Parties or the Court.
- 3. Accordingly, the Parties jointly request that the Court continue all deadlines in accordance with the below schedule:

<u>Deadline</u>	<b>Current Date</b>	<b>Proposed New Date</b>
Opposition to Motions	July 28, 2023	August 18, 2023
Replies In Further Support of Motions	August 11, 2023	September 1, 2023

IT IS SO STIPULATED.

Dated this 10<sup>th</sup> day of July, 2023

## **WILEY PETERSEN**

/s/ Jonathan D. Blum

By:

Jonathan D. Blum, Esq.
Nevada Bar. No. 9515
1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
jblum@wileypetersenlaw.com

and-

## SCHLAM STONE & DOLAN LLP

By:/s/ Samuel L. Butt		
Samuel L. Butt (admitted pro hac vice)		
Joshua D. Wurtzel (admitted pro hac vice)		
26 Broadway		
New York, New York 10004		
E-Mail: sbutt@schlamstone.com		
E-Mail: jwurtzel@schlamstone.com		
Attorneys for Plaintiffs John Suprock, Laurie		
Suprock, Consortium LLC, and Renewable Energy		
Now, LLC		

1 Dated this 10th day of July, 2023 FENNEMORE CRAIG, P.C. 2 By: /s/ Christopher H. Byrd Christopher H. Byrd 3 Chelsie A. Adams 4 9275 W. Russel Road, Suite 240 Las Vegas, Nevada 89148 5 Telephone: (702) 692-8000 Facsimile: (702) 692-8099 6 Email: <a href="mailto:cbyrd@fennemorelaw.com">cbyrd@fennemorelaw.com</a> Email: cadams@fennemorelaw.com 7 8 and-9 FENNEMORE CRAIG, P.C. 10 By: \_ /s/ David A. TImchak David A. Timchak (admitted *pro hac vice*) 11 2394 E. Camelback Road, Suite 600 12 Telephone: (602) 916-5000 Facsimile: (602) 916-5999 13 Email: dtimchak@fennemorelaw.com 14 Attorneys for Defendant Quantum Energy, Inc. 15 16 **ORDER** 17 IT IS HEREBY ORDERED that oppositions to the pending summary-judgment motions are due on August 18, 2023, and replies are due on September 1, 2023. 18 19 20 UNITED STAILES DISTRICT JUDGE 21 **DATED:** July 11, 2023 22 23 24 25 26 27

28